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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

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|----------------------------|---|--------------------------|
| In Re: | § | |
| Stephen Brant Peterson, Jr | § | Case No. 19-70196-HDH-13 |
| Kristy Kay Peterson | § | Chapter 13 |
| DEBTORS | § | |

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Come Now Debtors, by counsel, and for this Motion and state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtors were in a prior case during the preceding year. Debtors' Chapter 13, Case No. 19-70020 was filed on 01/23/2019.
3. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed because at the time of filing, debtor's income was dependent on the amount of work available to him as a contract worker for The Aztec Well Family (Aztec). His final check with Aztec was on January 4, 2019. He did not begin working again until March and received his first check on March 22, 2019. Due to this lapse in employment, debtors made their first plan payment, but were not able to maintain their regular monthly expenses plus the plan payment. By the time Debtor began working and receiving regular income again, they had fallen too far behind to catch up.
5. On July 15, 2019 Debtor received an offer letter from Halliburton to return to his previous position as a Senior Field Professional of Directional Drilling. This position offers a base salary as well as eligibility for overtime when applicable.

The base salary will allow debtors to maintain regular monthly expenses on top of a projected plan payment of \$3,105 which includes their mortgage and two car payments.

6. Debtors are refiling to save their home, their 2004 Ford F150 and their 2004 Dodge Durango.

WHEREFORE, Debtors request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on July 25, 2019, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtors